While the suits do not always succeed in court, apparently they are effective in helping to intimidate Scott's adversaries. Dozens of people refused to speak about Scott for this article because they expressed fear of being sued.

Over the years, Scott's followers occasionally have resorted to verbal threats and physical violence to defend their minister. In 1985, a musician in Scott's band who criticized the preacher reported to officials that he was jumped, punched and tossed through a plate glass window by two church followers. The musician, Donald Vladimir Nicoloff, was treated for facial and leg cuts.

In the months leading up to a trial on assault charges against his alleged attackers, Nicoloff claimed he received harassing, late-night phone calls from Scott's disciples, some threatening bodily harm. The trial against the two church followers ended in a hung jury when the key witness, the church's former head musician, fled to Tennessee because he feared reprisals from Scott's disciples, prosecutors maintained.

Glendale police were so concerned about a potential outbreak of violence by Scott's devotees that the prosecutor assigned to the case, Los Angeles County Deputy Dist. Atty. Herb Lapin, was issued a gun permit and assigned a police officer for protection during the trial.

"I'm not going to call his followers fanatics or lunatics," Lapin says. "But whenever you have a group that has strong followers, I find they are easily led by their leaders, whether they are good or bad."

ADMIRE HIM OR DESPISE him, Gene Scott has attained the kind of fame, lifestyle and influence that most people only dream about.

"Only in America," sighs Clark of the National Religious Broadcasters, "can people like this get on television, attract an audience and collect enough money to stay on television."

And only in Southern California, it seems, can a long-haired, loud-mouthed preacher pack a cavernous movie house each Sunday with followers eager to hear the word of God from him. In a city that attracts people seeking the good life, a pastor with a free spirit, a stable of horses, a chauffeured limo and an answer for everything can be an attractive role model.

"Gene Scott offers you all the advantages of Christianity with none of the inconveniences except tithing," says Rabbi William Kramer, a religious studies professor emeritus at Cal State Northridge and an admirer of Scott. "You don't have to put that in cellophane to sell it."

Yet others feel strongly that Scott has no business preaching in a church. The Christian Research Institute, an international religious center based in Irvine that monitors controversial religious movements, goes so far as to advise Christians not to attend Scott's services.

"During the last few years, Scott has become more and more outrageous and offensive," a CRI analysis concludes. "His language is crude, abusive and profane, clearly violating God's standards for Christians."

Such condemnation drives Scott up a wall. At a recent service, Scott groused that he is fed up with outsiders who have the nerve to question his conduct.

"They never stop!" Scott protested to loud applause. "These judgmental asses!"

PHOTO: COLOR, COVER: The eccentric preacher and his projects.

PHOTO: COLOR, (Gene Scott)

PHOTO: COLOR, Scott's Universal Cathedral, where he gives his

2-hour sermons.

PHOTO: COLOR, Scott makes his points with different pens, crossing out markings instead of erasing them.

PHOTO: COLOR, Guards protect the church's valuables, including him,

Scott says.

PHOTOGRAPHER: F. Scott Schafer

Type of Material: Profile

Descriptors: UNIVERSITY CATHEDRAL; TELEVISION; EVANGELISTS; CULTS; POLITICAL CONTRIBUTIONS; CONTRIBUTIONS; FINANCIAL

DISCLOSURE; SUITS; SCOTT, GENE;

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1	Broadcasting. Again, are you asking him	149
2	whether Reading Broadcasting, Inc, employees	
3	Tom Root. I heard the question.	
4	MR. BECHTEL: Jesus, I thought that	
5	was clear.	
6	MR. HUTTON: No, it's not clear.	
7	MR. BECHTEL: Let's take a recess.	
8	(Discussion off the record)	
9	BY MR. BECHTEL:	
10	Q Do you now or within the past	
11	several years have you at Reading	
12	Broadcasting Company employed the services of	
13	Tom Root?	
14	MR. HUTTON: I'm going to object on	
15	the grounds of relevance because it doesn't	
16	relate to the license renewal term. I'll let	
17	the witness answer because it's a matter of	
18	record already in this case.	
19	THE WITNESS: Yes.	
20	BY MR. BECHTEL:	
21	Q In what capacity?	
22	MR. HUTTON: Same objection.	

1	THE WITNESS: I think I have him	150
2	as, on special projects.	
3	BY MR. BECHTEL:	
4	Q What special projects?	
5	MR. HUTTON: Same objection.	
6	THE WITNESS: Whatever I assign him	
7	to.	
8	BY MR. BECHTEL:	
9	Q What have you assigned him to?	
10	MR. HUTTON: Same objection.	
11	THE WITNESS: Answer the question?	
12	How can I describe what I assigned. I have	
13	used his expertise to, let's see, how do I	
14	describe it. I have utilized his expertise	
15	to advise me on a number of, a number of	
16	issues, everything from cable coverage to	
17	traffic system at the station, a wide variety	
18	of a wide variety of activities throughout	
19	the station.	
20	BY MR. BECHTEL:	
21	Q How frequently do you communicate	
22	with him?	

	151
1	MR. HUTTON: Same objection. When
2	you ask communicate, are you asking him
3	specifically about Reading Broadcasting, Inc,
4	matters?
5	MR. BECHTEL: No.
6	MR. HUTTON: Then I object and
7	instruct the witness not to answer.
8	BY MR. BECHTEL:
9	Q Yes.
10	MR. HUTTON: Go ahead.
11	THE WITNESS: I'm sorry, you
12	instructed me not to answer?
13	BY MR. BECHTEL:
14	Q I changed a no to yes, I'm asking
15	you
16	A Reading Broadcasting?
17	Q Yes.
18	A Okay, with regard to Reading
19	Broadcasting, how often do I communicate with
20	him? I would say three times a week.
21	Q Does he come to the station,
22	Reading Broadcasting Company station?

1	152 MR. HUTTON: I object on grounds of
2	relevance, but the witness can answer the
3	question.
4	THE WITNESS: He comes to the
5	station sometimes.
6	BY MR. BECHTEL:
7	Q Approximately how often does he
8	come to the station?
9	MR. HUTTON: Same objection. Go
10	ahead.
11	THE WITNESS: Go ahead and answer
12	it, okay. Again, the question was how often?
13	I would say he's there about one week a
14	month. Now, let me correct that, I would
15	think he's there about one week every two
16	months, that would be a better.
17	BY MR. BECHTEL:
18	Q Do you know why he's on your Web
19	page?
20	MR. HUTTON: Same objection. On
21	whose Web page?
22	MR. BECHTEL: You would ask me

		1 🗆 ว
1	that, it says registrant, Reading	153
2	Broadcasting, Inc, WTVE-DOM, what's that	
3	mean, domain name, WTVE.COM; does that help?	
4	MR. HUTTON: I guess it clarifies	
5	somewhat. I'm going to object on the grounds	
6	of relevance, but let the witness answer.	
7	THE WITNESS: You seem to be	
8	looking at a document, so I'd like to	
9	BY MR. BECHTEL:	
10	Q Would you like to look at that?	
11	A Yes, thank you.	
12	Q That's the first time I did this in	
13	this deposition.	
14	A No, I understand that. It doesn't	
15	mean I'm going to let you get away with it,	
16	but	
17	(Parker Deposition Exhibit	
18	No. 12 was marked for	
19	identification.)	
20	MR. HUTTON: I'm sorry, was there	
21	an 11 that you didn't ask questions about?	
22	MR. BECHTEL: Yes, there was,	

154 1 that's the Master Media Enterprises. 2 MR. HUTTON: Are you going to ask 3 any questions about it? 4 MR. BECHTEL: I might. 5 MR. HUTTON: I'm going to object to you asking any questions about it. 6 7 MR. BECHTEL: Yes, you will, I know 8 you will. 9 THE WITNESS: Can we take a break 10 for a minute? 11 MR. HUTTON: Sure. 12 THE WITNESS: Okay. 13 (Discussion off the record) 14 (The reporter read the record as 15 requested.) 16 BY MR. BECHTEL: 17 Do you know who Mike Cowan and John Q Rock are? 18 19 Α No. 2.0 0 From the area code, does that 21 appear to you to be the same area code as 22 Mr. Root?

		155
1	A Yes.	
2	Q It would appear to be Norwalk,	
3	Ohio?	
4	A That is correct.	
5	Q So you have three people on the	
6	Reading Broadcasting Web page or whatever	
7	these things are called in Norwalk, Ohio?	
8	MR. HUTTON: No, I'm going to	
9	object. You're mischaracterizing. This is	
10	not a web page. This is a document that	
11	Network Solutions, the company that oversees	
12	Web page domain name registrations has	
13	produced.	
14	You have not established that Mike	
15	Cowan or John Rock have anything to do with	
16	Reading Broadcasting, Inc.	
17	THE WITNESS: Yeah.	
18	MR. HUTTON: This is not the WTVE	
19	web page.	
20	MR. BECHTEL: You mean they could	
21	have my name here?	

MR. HUTTON: Yes.

22

1	156 MR. BECHTEL: How would my name get
2	there?
3	MR. HUTTON: If the Web site
4	company listed you as a contact person, they
5	could be a third-party contractor, basically.
6	MR. BECHTEL: So someone told
7	Network Solutions that under Reading
8	Broadcasting, Inc, they wanted Mr. Cowan and
9	Mr. Root and Mr. Rock to be listed; is that
10	correct?
11	MR. HUTTON: I'm not an expert in
12	this area.
13	MR. BECHTEL: Well I thought you
14	just told me that the registrant had to tell
15	them what to put down there.
16	MR. HUTTON: Well I think that's
17	right, but you started out by saying that
18	this was the WTVE Web page, and it's not.
19	MR. BECHTEL: I'll rephrase that.
20	BY MR. BECHTEL:
21	Q On this document, by whatever name,
22	can you explain why someone asked the issuer

of the document to associate Messrs. Cowan, Rock and Root with Reading Broadcasting, Inc, as the registrant?

A As I understand this document, in looking at it, it starts out after the printed portion, if you will, the typed portion starts out with registrant. I asked Mr. Root to set up the Web page for, as one of the projects that he worked on for the corporation. I assume in the process of doing that, he registered WTVE.COM as our name, and in doing so, utilized the services of Mr. Cowan and Mr. Rock to set up the Web page and listed them as contacts for that purpose, and himself in terms of, it says billing contact.

So I assume that Network Solutions, if there's a bill for our services and we don't pay it, would call Mr. Root and say why aren't you paying your bill.

Q What is the utility of registering with these people, I mean how does that, what

does that accomplish?

2.2

MR. HUTTON: I'm going to object on grounds of relevance, but you can answer the question.

THE WITNESS: I believe that that, in effect, reserves for your use your name. Somebody else can't come along and utilize your name, much like you would register a trade name.

I am not, by any means, an expert on the Internet, but I believe that to be the case.

#### BY MR. BECHTEL:

Q Let's go back to our Exhibit 11.

The question I asked you quite some time ago before we got to Reading Broadcasting, I asked you if you employed the services of Mr. Root with other broadcasting activities in which you are engaged and I would ask you if the reference to TIBS Corporation, or Corp in this letter refers to Two If By Sea?

MR. HUTTON: I'm going to object on

		159
1	grounds of relevance and instruct the witness	133
2	not to answer.	
3	BY MR. BECHTEL:	
4	Q I would ask if this reflects that	
5	Mr. Root is being copied on a negotiation for	
6	the sale of your Hartford interest?	
7	MR. HUTTON: I object on grounds of	
8	relevance and instruct the witness not to	
9	answer.	
10	BY MR. BECHTEL:	
11	Q Do the duties that you've assigned	
12	to Mr. Root for the Hartford LMA include	
13	negotiating the sale and purchase of the	
14	station?	
15	MR. HUTTON: Same objection.	
16	BY MR. BECHTEL:	
17	Q What other duties have you assigned	
18	to Mr. Root with regard to the Hartford	
19	station?	
20	MR. HUTTON: Same objection.	
21	BY MR. BECHTEL:	
22	Q What duties have you assigned to	

1	Mr. Root with regard to the 29 Palms station?	160
2	MR. HUTTON: Same objection.	
3	BY MR. BECHTEL:	
4	Q The Dallas station?	
5	MR. HUTTON: Same objection.	
6	(Parker Deposition Exhibit	
7	No. 13 was marked for	
8	identification.)	
9	BY MR. BECHTEL:	
L 0	Q Exhibit 13 is a document that has	
L 1	been provided to Adams Communication	
L 2	Corporation in the discovery phase of our	
L 3	current proceeding.	
L 4	Do you know why, sir, Mr. Root	
L 5	received a copy of this?	
L 6	A Well it appears because George	
L 7	Mattmiller sent it to him.	
L 8	Q Did you delegate to Mr. Mattmiller	
L 9	responsibilities for deciding what to engage	
2 0	Mr. Root in?	
21	A Well, Mr. Mattmiller is the	
22	assistant general manager of the station and	

	1	51
1	he has the power to call upon anybody who	ΣТ.
2	works for me, or for the station.	
3	Q Fair enough. Has Mr. Mattmiller	
4	recently terminated his employment with	
5	Reading Broadcasting, Inc?	
6	A Yes.	
7	Q Would you describe the	
8	circumstances under which he did so?	
9	MR. HUTTON: Objection, relevance.	
10	You can answer the question.	
11	THE WITNESS: He got a better	
12	offer.	
13	BY MR. BECHTEL:	
14	Q Is he working for your client in	
15	Peoria?	
16	MR. HUTTON: Objection, relevance.	
17	You can answer the question.	
18	THE WITNESS: Yes, he is.	
19	MR. BECHTEL: Now, I don't want to	
20	offend you twice by not showing you, so I'll	
21	show it to you.	
22	THE WITNESS: Okay.	





### Reading Broadcasting, Inc. INDEX OF F

Copies of the following files from WTVE's Public File were requested by and made for Mr. James Donostio from the law firm of Kozloff, Diener, Payne & Fegley, P.C. based on his visit of June 24, 1999:

- 1). FCC Common Carrier Land Mobile
- FCC Amendment to File BRCE-940407KF **2**)...
- 3). Petition for Legve to Amend and Amendment
- FCC Correspondence 4).
- 5). Earl Township
- 5). Radio Licenses
- **Broadcast Station License**
- Modification of License-October 29, 1981
- WTVE Common Carrier Status
- **Operating Frequency Checks**
- Microwave Frequencies 10).
- 11). Contour Mape
- 12).
- License Renewal-1999
- Partel, Inc. Management Services Agreement 13).
- 14). Telemundo Network Affiliation Agreement
- 15). Video Catalog Channel, Inc. Programming Agreement
- 16). Annual Ownership Report
- 17). FCC Ownership Report-Form 323
- 18). Transfer of Control
- 19). Petition for Leave to Amend and Amendment
- 20). Regulatory Fee Correspondence
- 21). Regulatory Fee Correspondence
- 22). **Annual Employment Reports**

Copies of the requested files, at \$.10 per copy, were picked up by Mr. Donofrio on Monday, June 28, 1999.

George Mattmiller

Asst. General Manager Title:

Date: June 25, 1999

Frank McCracken C.C.:

Tom Root

**EXHIBIT** 

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## Brand every e-mail you send

HELMON\* COMMON

Registrant:

Reading Broadcasting, Inc. (WTVE-DOM)

1729 N. 11th St. Reading, PA 19604 US

Domain Name: WTVE.COM

Administrative Contact:

Cowan, Mike (MC1256) mikec79@ACCNORWALK.COM

419-668-4080 (FAX) 419-668-4077

Technical Contact, Zone Contact:

Rock, John (<u>JR13379</u>) johnr@ACCNORWALK.COM

419 668 4080 (FAX) 419 668 4077

Billing Contact:

Root, Tom (TR5304) tlroot@ACCNORWALK.COM

419 668 4894 (FAX) 419 668 4894

Record last updated on 18-Dec-98.

Record created on 18-Dec-98.

Database last updated on 25-Aug-99 04:17:11 EDT.

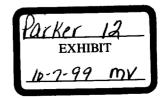
Domain servers in listed order:

NS1.ACCNORWALK.COM

NS2.LCI.NET

207.87.221.2 150.159.216.206

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I certify that I have this 18th day of October 1999 caused copies of the foregoing MOTION TO ENLARGE ISSUES (FALSE STATEMENTS AND MISREPRESENTATIONS BY MICHEAL PARKER IN BANKRUPTCY PROCEEDING to be hand delivered to the offices of the following:

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